

EXHIBIT 17

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JOHNNY M. HUNT,)
Plaintiff,)
)
-vs-) C.A. NO.
)
) 3:23-cv-00243
SOUTHERN BAPTIST CONVENTION;)
GUIDEPOST SOLUTIONS LLC; and)
EXECUTIVE COMMITTEE OF THE)
SOUTHERN BAPTIST CONVENTION,)
Defendants.)

Videotaped deposition of JANET HUNT,
taken on behalf of the Defendants, pursuant to the
stipulations contained herein, reading and signing
of the deposition being reserved, in accordance
with the Federal Rules of Civil Procedure, before
Theresa B. Kramer, Certified Court Reporter, at
Bradley Arant Boult Cummings, LLP, Promenade Tower,
1230 Peachtree Street, N.E., Atlanta, Georgia,
30309, on the 19th day of April, 2024, commencing
at the hour of 11:02 a.m.

1 APPEARANCES OF COUNSEL

2 On behalf of the Plaintiff:

3

ROBERT D. MACGILL, ESQ.

4

PATRICK J. SANDERS, ESQ.

ELIZABETH L. MERRITT, ESQ. (via Zoom)

5

MacGill PC

156 E. Market Street

6

Suite 1200

Indianapolis, Indiana 46204

7

T: (317) 721-1253

E: robert.macgill@macgillllaw.com

8

patrick.sanders@macgillllaw.com

9

elizabeth.merritt@macgillllaw.com

10 On behalf of Defendant GUIDEPOST SOLUTIONS LLC:

11

TERENCE W. MCCORMICK, ESQ.

SCOTT A. KLEIN, ESQ

12

ALEX OTCHY, ESQ. (via Zoom)

Mintz & Gold LLP

13

600 Third Avenue

25th Floor

14

New York, New York 10016

T: (212) 696-4848

15

E: mccormick@mintzandgold.com

klein@mintzandgold.com

16

otchy@mintzandgold.com

17

KATHERINE R. KLEIN, ESQ. (via Zoom)

18

Riley & Jacobson, PLC

1906 West End Avenue

19

Nashville, Tennessee 37203

T: (615) 320-3700

20

E: kklein@rjfirm.com

21

22

23

24

25

1 APPEARANCES OF COUNSEL (continued)
2 On behalf of Defendant EXECUTIVE COMMITTEE OF THE
3 SOUTHERN BAPTIST CONVENTION:

4 GRETCHEN M. CALLAS, ESQ. (pro hac vice)
5 JON L. ANDERSON, ESQ. (via Zoom)
6 Jackson Kelly PLLC
7 500 Lee Street East
8 Suite 1600
9 Charleston, West Virginia 25322
10 T: (304) 340-1000
11 E: gcallas@jacksonkelly.com
12 jlanderson@jacksonkelly.com
13

14 SCARLETT SINGLETON NOKES, ESQ.
15 Bradley Arant Boult Cummings LLP
16 1221 Broadway
17 Suite 2400
18 Nashville, Tennessee 37203
19 T: (615) 244-3556
20 E: snokes@bradley.com
21

22 GENE R. BESEN, ESQ. (pro hac vice)
23 Bradley Arant Boult Cummings LLP
24 1445 Ross Avenue
25 Suite 3600
Dallas, Texas 75202
T: (214) 257-9800
E: gbesen@bradley.com

17 MATTHEW C. PIETSCH, ESQ. (via Zoom)
18 Taylor, Pique, Marchetti & Blair, PLLC
19 2908 Poston Avenue
20 Nashville, Tennessee 37203
21 T: (615) 320-3225
22 E: matt@tpmblaw.com

23 Also Present:
24 Josh Coleman, Videographer
25 Johnny Hunt

1 INDEX TO EXAMINATION

2 Examination by Mr. McCormick 5

Examination by Ms. Callas 32

3

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5 INDEX TO EXHIBITS

6 (none marked)

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1 VIDEOPGRAPHER: We are now on the record.

2 This begins videotape No. 1 in the
3 deposition of Janet Hunt in the matter of Johnny M.
4 Hunt versus Southern Baptist Convention, Guidepost
5 Solutions, et al., in the United States District
6 Court for the Middle District of Tennessee,
7 Nashville Division.

8 Today's date is April 19th, 2024 and the
9 time is approximately 11:02 a.m.

10 This deposition is being taken at Bradley
11 Arant Boulton Cumming at the request of Bradley Arant
12 Boulton Cumming. The videographer is Josh Coleman of
13 Magna Legal Services. And the court reporter is
14 Theresa Kramer of Magna Legal Services.

15 Counsel will be noted on the stenographic
16 rec -- record.

17 Will the court reporter please swear in
18 the witness.

19 JANET HUNT,
20 having been called as a witness, was sworn and
21 testified as follows:

22 CROSS-EXAMINATION

23 BY MR. MCCORMICK:

24 Q. Hello again, Mrs. Hunt. I am still
25 Terence McCormick of the firm of Mintz & Gold and I

1 still represent Guidepost Solutions.

2 Earlier this morning I went through all
3 the, you know, rules of the road regarding a
4 deposition I -- when I took your deposition of the
5 30(b)(6) for Johnny Hunt Ministries.

6 I'm sure you recall them all.

7 A. Yes, sir.

8 Q. Just -- just by way of reminder, again,
9 this is testimony in a conference room, but it's
10 also testimony that you have a legal obligation
11 because you're under oath to testify truthfully and
12 fully just as though we were in a courtroom and in
13 a very real sense, we are in a courtroom.

14 A. Yes, sir.

15 Q. You understand. Okay.

16 Mrs. Hunt, could you please just tell me
17 something about yourself. Background, where did
18 you go to school?

19 A. I was born in Wilmington, North Carolina.
20 I went to John T. Hoggard High School. I did not
21 pursue any education beyond high school.

22 I was married in 1970 as a junior in high
23 school. Went on to complete high school in the
24 National Honor Society which I'm very proud of
25 after being a married woman, a married child in

1 high school.

2 I met the love of my life in early age so
3 we married early.

4 And I am a very proud wife and mother of
5 two daughters, four grandchildren, and one great
6 grandchild and a great grandchild on the way.

7 Q. Congratulations.

8 A. Thank you.

9 Q. Apart from high school education, did you
10 have any kind of professional education?

11 A. No, not exactly.

12 My husband -- my -- my father was a
13 public accountant for 50 years and I worked
14 alongside him in his -- his accounting firm, but I
15 didn't have any other formal education.

16 Q. My dad was -- was an accountant too so
17 I'm sure you learned a lot from him.

18 A. April 15th is a nightmare.

19 Q. Yeah. So tell me about -- after you got
20 married, you became a homemaker. You also had a
21 role in Mr. Hunt's ministry, did you not?

22 A. I was the women's ministry director at
23 our church for 17 years.

24 Q. And what did that entail?

25 A. Planning events for women once a month.

1 Q. Uh-huh. And did that have financial
2 responsibilities as well?

3 A. Eventually I was given a little sti- --
4 stipend.

5 Q. You have been described at various points
6 including I believe by your husband as the
7 bookkeeper.

8 A. Yes.

9 Q. Did you ever study accounting?

10 A. Just in high school.

11 Q. High school. You're familiar with the
12 double-sided ledger system of debits and credits?

13 A. Yes, sir.

14 Q. And accounting in terms of, you know,
15 balance sheets, asset, you know, profit and loss
16 statements and so forth?

17 A. Yes, sir.

18 Q. Right.

19 In addition to your role that you just
20 described, you also had a role, did you not, in
21 connection with certain businesses associated with
22 your husband's ministry; is that right?

23 A. I don't follow you.

24 Q. Well, I just took your deposition in
25 connection with Johnny Hunt Ministries; right?

1 A. Yes.

2 Q. You had a role in -- in that
3 organization?

4 A. Yes.

5 Q. Yes. Okay.

6 And I'm not going to go over what you
7 already testified to upon the admonishment of your
8 counsel.

9 Were there other such businesses that you
10 were associated with?

11 A. I worked for a law firm for a short time.

12 Q. Oh, really? What kind of law?

13 A. Real estate.

14 Q. Real estate law. What did you do for
15 them?

16 A. Just secretarial work.

17 Q. That wasn't associated with Johnny Hunt's
18 Ministries, though?

19 A. No, it wasn't.

20 Q. Were you associated with an entity called
21 3H Publishers?

22 A. Yes.

23 Q. All right. What was your role?

24 A. Bookkeeper. That's about it.

25 Q. Were you an officer?

1 A. I don't know that I was an officer. I
2 could have been. I don't remember.

3 Q. Did you draw a salary?

4 A. I don't think so.

5 Q. No? You did it for free?

6 A. I -- probably, like now.

7 Q. When did you do that?

8 A. From the beginning of the organization.

9 Q. Uh-huh.

10 A. Until it ended.

11 Q. Which was when?

12 A. I don't remember.

13 Q. Okay. Were there employees there?

14 A. No.

15 Q. No.

16 A. Wait a minute. There may have been
17 employees early, early on.

18 Q. And who might they have been?

19 A. Do you have that information?

20 Q. I'm asking you.

21 A. I don't remember. I don't remember.

22 Q. This is -- this is the one room where I
23 get to ask the questions.

24 A. I get it. I just don't remember.

25 Q. Family members?

1 A. Probably 'cause we were a family
2 organization --

3 Q. Yeah.

4 A. -- at that time.

5 Q. 3H Publishers was?

6 A. It was, yes.

7 Q. And what family members; do you remember?

8 A. My daughter -- it -- it involved -- or am
9 I thinking about It's a New Day? My daughter --
10 one of my daughters probably worked there making
11 tapes.

12 Q. Uh-huh. Was she -- was she paid a
13 salary?

14 A. I don't know. I don't remember.

15 Q. Okay. What about Timothy+Barnabas?

16 A. Yes.

17 Q. Okay. You worked for them?

18 A. Unofficially.

19 Q. Unofficially?

20 A. Well, at a time I did the bookkeeping.

21 Q. Okay.

22 A. And then we hired a CEO who took over
23 everything.

24 Q. Uh-huh. Did you draw a salary from
25 Timothy+Barnabas?

1 A. No. I wasn't getting --

2 Q. Did you receive any income --

3 A. -- a salary --

4 Q. -- from Timothy+Barnabas?

5 A. I think I did receive an income at one
6 point for something, but I don't remember --

7 Q. 10 --

8 A. -- what it was for --

9 Q. 1099?

10 A. Yes.

11 Q. Yeah. And 3H Publishers, did you get a
12 1099 from them?

13 A. I don't believe so.

14 Q. No? Okay.

15 What about New Song Ministries?

16 A. No.

17 Q. No?

18 Xtreme Conferences?

19 A. No.

20 Q. 3H Travel?

21 A. No.

22 Q. It's a New Day?

23 A. No.

24 Q. No. Any others?

25 A. Not that I recall.

1 Q. Okay. I want to be very clear, I do not
2 wish you to and I'm not asking you to divulge any
3 communications that took place simply between
4 yourself and Mr. Hunt. I don't want that. I'm not
5 entitled to it. If I stray into that, I trust that
6 Mr. McGill will interject. I will not take that
7 personally.

8 I also don't want to invade the substance
9 of your communications, you know, with a clergy
10 person or with a therapist. Okay? But to the
11 extent that you have knowledge that's your own that
12 is not defined entirely by those communications,
13 that's what my questions are going to.

14 A. (Nods head up and down.) Okay.

15 Q. You're aware, as I said earlier, that
16 this lawsuit arises out of an encounter between
17 Mr. Hunt and another woman, who just for purposes
18 of privacy we are referring to now as John Doe --
19 Jane Doe. Yes?

20 A. [REDACTED] [REDACTED]

21 Q. Okay. All right. Has been named. Okay.
22 I'm referring to this person as Jane Doe
23 henceforth --

24 MR. MACGILL: We'll agree. When he
25 refers to Jane Doe, he is referring to [REDACTED]

1 [REDACTED] So if you would understand that. We're
2 getting close to an agreement I think on this so
3 just understand that.

4 THE WITNESS: Okay.

5 MR. KLEIN: Thank you.

6 BY MR. MCCORMICK:

7 Q. If -- if for no other reason to avoid
8 having to have some poor paralegal at my firm black
9 out her name in the transcript of this deposition a
10 hundred times, I'm going to try to say Jane Doe and
11 I hope you understand who I'm referring to. And
12 when I say Jane Doe's husband, we know who that
13 person is, yes?

14 A. [REDACTED] [REDACTED]

15 Q. All right. You did it. There we go.
16 All right.

17 There was an encounter. Do you remember
18 when it took place?

19 A. July 25th, 2010.

20 Q. A Sunday?

21 A. Yes.

22 Q. Yes. All right. When did you first
23 learn that Jane Doe was where she was? Well, let
24 me back -- withdrawn.

25 Where did it take place?

1 A. Panama City Beach.

2 Q. And it took place in a condo on the
3 beach?

4 A. Yes.

5 Q. Yes.

6 MR. MACGILL: And could we agree that
7 we're going to allow her to testify but this is not
8 a waiver of the spousal privilege? We just don't
9 want to invite -- we don't want to fight on every
10 question here this morning. May we agree to the
11 extent we let her answer, we're not waiving the
12 privilege?

13 MR. MCCORMICK: To the extent it has not
14 already been waived, yes, and we'll get to that if
15 we have to. Hopefully we won't have to. Okay.

16 MR. MACGILL: But her answers today will
17 not be a waiver. We'll allow this to go forward on
18 a nonwaiver basis. Her answers today.

19 MR. MCCORMICK: I don't know that that's
20 necessarily possible, Counsel, because if this is
21 testimony in open court, and an answer is given and
22 you haven't objected on basis of privilege, I -- I
23 don't see how you can say it hasn't been waived.

24 MR. MACGILL: What I'm trying to do is
25 let you ask your questions, get the answers that

1 you want without shutting down entirely.

2 Her knowledge has come from her husband
3 and so we'd like to have the deposition proceed
4 without a -- you -- without us waiving the rights.
5 If you want us to instruct her not to answer on
6 her -- all communications, we'll do it. But I
7 don't think that's a good idea.

8 MR. MCCORMICK: I think that's why God
9 made lawyers and that's why you're here. If I ask
10 a question that elicits a communication between her
11 and Mr. Hunt --

12 MR. MACGILL: Okay. Then we'll object.

13 MR. MCCORMICK: -- then I will -- I will
14 respect the objection.

15 MR. MACGILL: All right.

16 MR. MCCORMICK: Okay?

17 MR. MACGILL: All right.

18 MR. MCCORMICK: All right.

19 MR. MACGILL: We've offered a way to
20 facilitate this and --

21 MR. MCCORMICK: I --

22 MR. MACGILL: -- it's been rejected and
23 so we'll instruct her not to answer.

24 MR. MCCORMICK: It has been. It has
25 been. And I thank you, Counsel, for making that

1 clear on the record.

2 And, again, I am not trying to pull a
3 fast one and -- and I trust that Mr. McGill will
4 object as appropriate. Okay.

5 BY MR. MCCORMICK:

6 Q. So Panama City Beach, Florida, Sunday,
7 July 25, 2010.

8 A. (Nods head up and down.)

9 Q. You became aware that Jane Doe was
10 present there at that time?

11 A. No. I became aware that she was there on
12 Monday, the 26th of July.

13 Q. I see. Very well.

14 When did you arrive at Panama City Beach
15 at the --

16 A. It would have either been the end of June
17 or it could have been the first of June. I don't
18 know 'cause we spend most of the summer there.

19 Q. Got it.

20 So you had already been there when Jane
21 Doe arrived?

22 A. Yes.

23 Q. For a while?

24 A. Yes.

25 Q. Okay. Who else was there?

1 A. My daughter and her husband.

2 Q. You have two daughters; right?

3 A. My daughter Deanna.

4 Q. Deanna.

5 A. Uh-huh.

6 Q. And -- and Mr. Hunt was there as well?

7 A. Yes.

8 Q. Okay. And, again, for -- for the
9 summertime?

10 A. Yes.

11 Q. Okay. You learned on -- on Monday, the
12 26th, 2010. How did you learn?

13 A. I went down to the beach and she was
14 there laying there in her little white bikini. We
15 were all facing the ocean this way (gesturing) as
16 you sit on the beach. And I go down there and
17 [REDACTED] is laying this way, sideways in front of our
18 beach chairs (gesturing). And she knew they were
19 our beach chairs because our name is on the back of
20 the chairs.

21 So she was laying in a little white
22 bikini right there in front of us parallel on the
23 beach all day without moving, without -- other than
24 flipping her hair once in a while. Didn't get
25 water. Didn't put on lotion. She had her top

1 undone laying there on her stomach. No
2 conversation for the entire day.

3 Q. You had no conversation with Jane Doe
4 during the entirety while she was there --

5 A. None.

6 Q. -- on the beach?

7 A. None.

8 Q. Did your daughter?

9 A. No. Nobody did.

10 Q. How far away were you from one another?

11 A. Probably from me to you.

12 Q. Okay. We heard some testimony yesterday
13 from Mr. Hunt that you had confronted him about a
14 text message. Do you recall that?

15 A. I do.

16 Q. All right. Again, I'm not -- I'm not
17 trying to intercept whatever you said to Mr. Hunt
18 or vice versa. How did you come to see the text
19 message?

20 A. Okay. We were on the beach on Monday.
21 On Tuesday morning, my husband goes for a run and
22 he leaves his phone. He doesn't usually leave his
23 phone, but he left his phone behind.

24 So there was a ding on the phone so I
25 looked at it to see if it was something important.

1 And in that process I saw there were two text
2 messages from [REDACTED] [REDACTED] One of the messages
3 said, can I borrow some salt and pepper? And his
4 response was, Janet will give it to you.

5 The other text message from her said, can
6 I go on a run with you? And his response was, not
7 a good idea.

8 So as a result of that, I went next door
9 where she was supposed to be staying, knocked on
10 the door and there was no answer. So I figured
11 that she had gone for a walk. So I stood on the
12 balcony where I could see people where they walk
13 where they -- before they come into the building
14 and I could see her coming. So I stood there and
15 waited for her to come off the elevator.

16 And when she got off the elevator, I said
17 to her, [REDACTED] pack your bags, get off this beach
18 and don't you ever contact my husband again by
19 email, text or phone call. Do you understand?

20 She said, yes, ma'am. And that was the
21 last I saw of her.

22 Q. And you saw the text message popping up
23 with the ding.

24 A. Yes.

25 Q. Within your own condo?

1 A. Yes.

2 Q. All right. And where was Johnny at this
3 point?

4 A. He had gone for his walk.

5 Q. He was off for his walk.

6 A. Yes.

7 Q. Okay. And --

8 A. And just so you'll know, I knew nothing
9 about the circumstances of which happened on Sunday
10 for me to ask her to leave. I knew nothing of
11 that.

12 Q. You were prompted to because you were
13 offended by her presence on the beach?

14 A. I was offended by her presence, her --
15 her lack of inappropriate -- her lack of
16 appropriateness, and the fact that she had
17 contacted my husband wanting to go for a walk.

18 And another reason I was offended by her
19 is because she had always been the one to reach out
20 to my husband in the past by text messages that I
21 knew about, never her husband contacted Johnny for
22 help. But she was always the one reaching out to
23 him wanting help for her husband.

24 Well, that offended me because I felt
25 like another woman should not be reaching out to my

1 husband for help. It should have been the husband
2 reaching out to my husband for help and not just
3 her.

4 Q. Uh-huh.

5 A. So I never had a gel with her in the
6 beginning because I didn't like the way she carried
7 on with things.

8 Q. Did you --

9 A. So I wanted her -- I felt like for -- my
10 job is to protect my husband and I saw her presence
11 as being there being right next door to us, the way
12 she was acting, I said to (indiscernible) this is
13 not a good thing.

14 And this was the last week of our
15 sabbatical and I was not going to put up with her
16 for that week invading my space.

17 Q. Were you concerned at that time that
18 Mr. Hunt may have been committing adultery?

19 A. No.

20 Q. Were you concerned about Mr. Hunt
21 committing infidelity?

22 A. No.

23 Q. No?

24 A. No. And he didn't commit adultery.

25 Q. Uh-huh.

1 A. But, no. I've never had a concern about
2 him being in -- having infidelity issues.

3 Q. Before that incident?

4 A. And still.

5 Q. When you confronted Jane Doe, did she
6 attempt to defend herself?

7 A. No.

8 Q. Did she speak words to you?

9 A. No. She said, yes, ma'am. When I said
10 do you understand, she said, yes, ma'am. That was
11 all.

12 Q. That's nothing? Nothing else?

13 A. Nothing else.

14 Q. Did she display any emotion?

15 A. No.

16 Q. Did she seem surprised?

17 A. No.

18 Q. Did she -- did you read anything on her
19 face to indicate that you thought she knew she had
20 crossed a line?

21 A. No.

22 Q. Did you use the word home wrecker?

23 A. No.

24 Q. Home breaker or anything like that?

25 A. No. I -- I said exactly what I told

1 you --

2 Q. Did you raise your voice --

3 A. -- I said to her. No. I didn't raise my
4 voice. I said it very firmly.

5 Q. You were angry?

6 A. Of course.

7 Q. Mrs. Hunt, in the past, have you ever
8 heard of instances where Mr. Hunt had relationships
9 with other women?

10 A. No.

11 Q. To your knowledge, was ever there a
12 discussion within First Baptist Church Woodstock
13 about such instances?

14 A. No.

15 Q. In your mind, Mrs. Hunt, for a married
16 man to be alone in a condo with a woman who wasn't
17 his wife, in your mind is that wrong?

18 A. Yes.

19 Q. Is that a sin?

20 A. Yes.

21 Q. For a clergy person would that be a
22 scandal?

23 A. No.

24 Q. No? Why not?

25 A. I don't see it as a scandal. A scandal

1 to me seems like something that's ongoing.

2 Q. Would you consider it scandalous for a
3 clergy person to be in a condominium with a woman
4 who wasn't his wife?

5 A. No; because it depends on what happens in
6 that room.

7 Q. Okay.

8 A. No.

9 Q. If it were of an intimate nature, would
10 that be improper?

11 A. It would be improper.

12 Q. Yeah. Would it be scandalous?

13 A. How do you -- how do you define
14 scandalous?

15 Q. Offensive to the sensibilities of the
16 community.

17 A. Well, the community doesn't need to know
18 about what happens in private places.

19 Q. That's another question. I did not ask
20 that question.

21 My question to you, ma'am, was: Would it
22 be if known to the community -- and in this case
23 I'm talking about Southern Baptists, a scandal to
24 know that their minister had been alone with a
25 woman who wasn't his wife?

1 A. I wouldn't call it a scandal.

2 Q. What would you call it?

3 A. Unbecoming behavior.

4 Q. I'll take that.

5 Has the possibility of Mr. Hunt's
6 involvement with a woman other than yourself ever
7 been alluded to at First Baptist Church Woodstock?

8 A. No.

9 Q. Not from the pulpit?

10 A. Not -- no. You mean --

11 Q. Well --

12 A. Repeat that question.

13 Q. Has the possibility of Mr. Hunt's
14 involvement with another woman ever been alluded to
15 from the pulpit?

16 A. After the Guidepost report came out, yes.

17 Q. Reverend Morton?

18 A. Yes.

19 Q. Yes. Okay.

20 Did you make any comments to other
21 people -- no other occasion?

22 A. I'm sorry. Repeat.

23 Q. On no other occasion? Just Reverend
24 Morton?

25 A. Yes. Just him.

1 Q. Okay. Did you make any comments to other
2 people who were there in Panama City Beach about
3 Jane Doe's presence other than Mr. Hunt?

4 A. My daughter and son-in-law.

5 Q. What did you tell them?

6 A. Well, we discussed the fact that she was
7 acting very inappropriately and I told them that I
8 had told her to leave.

9 Q. What did they say?

10 A. Good.

11 Q. Did you ever email anybody other than
12 your husband and attorneys in this matter about the
13 Guidepost report?

14 A. No.

15 Q. No?

16 A. I don't believe so.

17 Q. Text message?

18 A. About the Guidepost report? Well, people
19 were sending us text messages of condolences as far
20 as, you know, I read what happened, I'm so sorry.
21 And we was -- I would respond with things like
22 thank you, pray for us.

23 Q. Uh-huh.

24 A. Things like that. But I never would --
25 discussed it by text message or email.

1 Q. Okay. All right. What about
2 communications over text message about the
3 encounter with -- with Jane Doe?

4 A. No.

5 Q. No?

6 A. No.

7 Q. All right. And just to make sure that
8 this is completely covered and I know I asked you
9 about whether you had heard rumors, but without
10 involving any communications with Mr. Hunt, has he
11 ever committed infidelity in your marriage besides
12 the encounter with Jane Doe?

13 A. No.

14 MR. MACGILL: Object to the form of the
15 question. Move to strike it.

16 MR. MCCORMICK: All right. Read back the
17 question.

18 COURT REPORTER: And just --

19 MR. MACGILL: It's been answered,
20 Counsel. You need to move on.

21 MR. MCCORMICK: No, no, no, no. No.
22 I --

23 MR. MACGILL: I've warned you, Counsel,
24 you were making -- you were making -- through your
25 questions, you're making a difficult situation much

1 worse for your company. I'm giving you fair
2 warning.

3 MR. MCCORMICK: I'm -- I'm really not
4 concerned about that. What's the basis --

5 MR. MACGILL: You should be.

6 MR. MCCORMICK: What's the basis for your
7 motion to strike?

8 MR. MACGILL: Counsel, you are asking
9 questions that you know have no basis in fact. You
10 know that. And I'm -- all I can do is just explain
11 to you that this is prejudicial to your client.

12 MR. MCCORMICK: You have made a form
13 objection. I want to know what's the basis of the
14 form objection.

15 MR. MACGILL: I'm explaining -- I move to
16 strike it. You have no basis for the claims that
17 you're making. Your -- the premises --

18 MR. MCCORMICK: I'm unaware that I've
19 made any claims.

20 MR. MACGILL: All right. You -- you go
21 ahead. Let me just -- let me just say on the
22 record that I just want to emphasize that your
23 conduct is prejudicial to your client and
24 prejudicial to an appropriate proceeding.

25 You may proceed.

1 BY MR. MCCORMICK:

2 Q. Mrs. Hunt, yesterday afternoon we had
3 some testimony from Mr. Hunt that he had a practice
4 of forwarding to you certain emails for you to
5 file.

6 A. Yes.

7 Q. You're aware -- is that correct?

8 A. Yes.

9 Q. And -- and I just wanted to ask you just
10 something about them. What was the character of
11 those emails that he filed to you?

12 A. He sends me all sorts of emails to file.
13 It could be anything.

14 Q. And to your knowledge, some of them have
15 to do with this lawsuit?

16 A. Yes.

17 Q. And could you tell me what -- you know,
18 again without invading attorney-client privilege,
19 what types of emails they -- they are?

20 A. A lot of -- a lot of law -- lawyer stuff,
21 as far as motions and. . .

22 Q. So -- so to make this a little easier --

23 A. Things that don't make much sense to me.

24 Q. If I -- tell me if I'm translating your
25 answer correctly. And I'm not trying to place

1 deceptive words in your mouth.

2 Are we talking about -- with regard to
3 the emails you just described, we're talking about
4 emails perhaps that were sent to Mr. Hunt by -- by
5 Mr. McGill's firm --

6 A. Yes.

7 Q. -- updating him?

8 A. Yes.

9 Q. Attaching copies --

10 A. Yes.

11 Q. -- of the magistrate --

12 A. Yes.

13 Q. -- judge's order?

14 A. Yes.

15 Q. All right. Not counting those, are there
16 other emails that Mr. Hunt would have forwarded to
17 you that would have been descriptive of the subject
18 matter of this lawsuit?

19 A. No.

20 Q. Not with lawyers?

21 A. No.

22 Q. Okay.

23 MR. MCCORMICK: Counsel, I know that we
24 wrapped up the end of yesterday's deposition which
25 Mr. Hunt testified accordingly. He also testified

1 that, you know, he did have access and control over
2 those emails that are now -- that -- filed by
3 Mrs. Hunt.

4 I would only ask that, you know -- I
5 would reiterate what Mr. Klein said. We would ask
6 for their production to the extent that they're
7 responsive and producible.

8 And if they're privileged, of course, if
9 you need to update your privilege log, that's
10 perfectly fine. We would -- we would just simply
11 want to protect the record that we believe we have
12 a right to have them to the extent that Mr. Hunt
13 hasn't already produced them.

14 MR. MACGILL: Understood.

15 MR. MCCORMICK: I don't have any further
16 questions at this time. And I thank you.

17 MS. CALLAS: I might have a few. How
18 about I ask a few questions and then we might
19 take a break and then --

20 MR. MACGILL: Okay. That's fine.

21 CROSS-EXAMINATION

22 BY MS. CALLAS:

23 Q. So, hi, Mrs. Hunt. It's Gretchen Callas
24 again.

25 We've talked a little bit about your --

1 your husband's phone in 2010. Do you recall what
2 kind of phone that was?

3 A. I'm sorry. What's the question?

4 Q. What kind of cell phone he had.

5 A. Would have been an iPhone.

6 Q. And you mentioned you heard a bing, so
7 some sort of notification from the phone occurred;
8 is that right?

9 A. Yes.

10 Q. And caused you to look at it was --

11 A. Yes.

12 Q. Did the phone have any kind of password
13 protection?

14 A. Probably, but I know that password.

15 Q. And that would have been my next
16 question.

17 A. Uh-huh.

18 Q. So you had access to your husband's phone
19 if you needed?

20 A. Yes.

21 Q. You mentioned that Jane Doe had texted
22 your husband prior to this July 27th, 2010; is that
23 right?

24 A. Yes, ma'am.

25 Q. And had you personally seen those texts?

1 A. No.

2 Q. Was this text message that you saw on
3 July 27th then the first text message you actually
4 saw with your eyes between Jane Doe and your
5 husband?

6 A. Yes, with my eyes. But he would always
7 tell me though that she had texted him wanting to
8 have dinner or whatever to discuss [REDACTED] problems
9 at church.

10 Q. Now, Jane Doe and her husband were in
11 Panama City earlier in July; is that correct?

12 A. They were. Two weeks before.

13 Q. And did you and your family spend time
14 with them?

15 A. No. I recall that Johnny went out to
16 lunch or something. I think it was lunch with
17 them. And then when they came back, they sat out
18 by the pool for a few minutes. But we had no
19 communication.

20 And I didn't ever want to be around her
21 because I didn't like the way she acted. So I
22 always chose not to go.

23 I went once with them to dinner and
24 thought I don't like this girl, she doesn't talk to
25 me, she only talks to him, they only talk about

1 church stuff. So I didn't want to be around her so
2 I didn't go with them to lunch. I just stayed
3 behind and let them do their business.

4 Q. Was the dinner you just mentioned in that
5 July 8th --

6 A. I think it was a lunch.

7 Q. I thought you said you went to dinner
8 once.

9 A. Oh, that was way long ago.

10 Q. Oh, so it was not --

11 A. I don't remember when, but it wasn't --
12 like probably wasn't even in the same year.

13 Q. Okay. After July 27th -- well, maybe
14 even on July 27th, 2010, did you text message with
15 the husband of Jane Doe?

16 A. No, but I talked to him on the phone
17 because he called me. He called me asking me why I
18 had asked her to leave the beach. So I told him.

19 I didn't like the way she presented
20 herself. It was very inappropriate. Wasn't a good
21 idea for her to be next door alone. I didn't like
22 the fact that she had asked Johnny to go for a
23 walk. And I felt like she didn't have any business
24 being there. And so I asked her to leave.

25 Q. So this conversation was on your phone?

1 A. Yes.

2 Q. And it occurred on the 27th or --

3 A. Let me think. I -- it -- I'm not sure.
4 It could have been the 28th. But it was probably
5 the 27th. I'm not positive about that.

6 Q. Were there other conversations after that
7 conversation with the husband of Jane Doe?

8 A. I don't believe so.

9 Q. No other -- either talking on the phone
10 or text messaging with him?

11 A. No.

12 Q. Did he ever --

13 MR. MACGILL: With him -- and just,
14 Gretchen, you're referring with [REDACTED] [REDACTED] after
15 July 27th?

16 MS. CALLAS: Yes.

17 MR. MACGILL: Okay. Sorry. Yeah.

18 A. No. I don't think so. Not that I
19 recall.

20 BY MS. CALLAS:

21 Q. And that's -- that -- yeah. If you would
22 like me to clarify I can.

23 So after this first call you had with
24 Jane Doe's husband, did you speak to him either on
25 the phone or through text message or email?

1 A. I think just that one time when he called
2 me.

3 Q. Now, there was a meeting where Roy
4 Blankenship was present; is that correct?

5 A. Yes.

6 Q. And both Jane Doe and her husband were
7 present; is that correct?

8 A. Yes. That would have been like in early
9 August I think when we met.

10 Q. Any other times you recall being in the
11 presence of either Jane Doe or her husband after
12 that meeting with Mr. Blankenship in early
13 August --

14 A. Not me. No.

15 Q. And no text messages between you and Jane
16 Doe --

17 A. No.

18 Q. -- after --

19 A. No.

20 MS. CALLAS: So why don't we take a
21 five-minute break and maybe we're done.

22 MR. MACGILL: No problem.

23 VIDEOGRAPHER: We are now going off the
24 video record. The time is currently 11:33 a.m.

25 (Off the record; recess.)

1 VIDEOGRAPHER: We are now back on the
2 video record. The time is currently 11:45 a.m.

3 MR. MCCORMICK: I don't have any further
4 questions.

5 MS. CALLAS: Me either.

6 MR. MACGILL: No questions. Thank you.

7 COURT REPORTER: Does your client want to
8 read or waive signature?

9 MR. MACGILL: Read.

10 COURT REPORTER: And did you want a copy
11 of her transcript, Mr. MacGill?

12 MR. MACGILL: Yes.

13 COURT REPORTER: And, Ms. Callas, did you
14 want a copy of the transcript?

15 MS. CALLAS: Yes, please.

16 VIDEOGRAPHER: Okay. We are now going
17 off the video record. The time is currently 11:45
18 a.m.

19 (Proceedings concluded at 11:45 a.m.)

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E R R A T A P A G E

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Pursuant to Rule 30(e) of the Federal Rules of
 Civil Procedure and/or Georgia Code Annotated
 9-11-30(e), any changes in form or substance which
 you desire to make to your deposition testimony
 shall be entered upon the deposition with a
 statement of the reasons given for making them.
 To assist you in making any such corrections,
 please use the form below. If supplemental or
 additional pages are necessary, please furnish same
 and attach them to this errata sheet.

I, the undersigned, JANET HUNT, do hereby certify
 that I have read the foregoing deposition and that,
 to the best of my knowledge, said deposition is
 true and accurate (with the exceptions of the
 following corrections below).

Page	/Line/	/Change/	/Reason/
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 21 _____
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 22 Sworn to and subscribed before me
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 23 Notary Public, this _____ day of
 _____, 202_.
 24 My commission expires: _____
 25

DISCLOSURE

Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosures:

I am a Georgia Certified Court Reporter. I am here as a representative of Regency-Brentano, Inc. I am not disqualified for a relationship of interest under the provisions of OCGA 9-11-28(c). Regency-Brentano, Inc. was contacted by the offices of Magna Legal Services to provide court reporting services for this deposition. Regency-Brentano, Inc. will not be taking this deposition under any contract that is prohibited by OCGA 15-14-37 (a) and (b). Regency-Brentano, Inc. has no exclusive contract to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition. Regency-Brentano, Inc. will charge its usual and customary rates to all parties in the case and a financial discount will not be given to any party to this litigation.

This the 19th day of April, 2024.

THERESA B. KRAMER, GA CCR B-1601

C E R T I F I C A T E

I hereby certify that the foregoing transcript was taken down as stated in the caption, that the witness was first duly sworn, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 38 represent a true, correct, and complete transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

The witness did reserve the right to read and sign the transcript.

This, the 25th day of April, 2024.

Theresa B. Kramer

THERESA B. KRAMER, GA CCR B-1601



Magna Key Contacts



Schedule a Deposition:

Scheduling@MagnaLS.com | 866-624-6221

Order a Transcript:

CustomerService@MagnaLS.com | 866-624-6221

General Billing Inquiries:

ARTeam@MagnaLS.com | 866-624-6221

Scheduling Operations Manager:

Patricia Gondor (E: PGondor@MagnaLS.com | C: 215-221-9566)

Customer Care:

Cari Hartley (E: CHartley@MagnaLS.com | C: 843-814-0841)

Director of Production Services:

Ron Hickman (E: RHickman@MagnaLS.com | C: 215-982-0810)

National Director of Discovery Support Services:

Carmella Mazza (E: CMazza@MagnaLS.com | C: 856-495-1920)


Billing Manager:

Maria Capetola (E: MCapetola@MagnaLS.com | C: 215-292-9603)

Director of Sales Operations:

Kristina Moukina (E: KMoukina@MagnaLS.com | C: 215-796-5028)



A				
access 32:1 33:18 accountant 7:13,16 accounting 7:14 8:9,14 accurate 39:9 acted 34:21 acting 22:12 27:7 addition 8:19 additional 39:7 admonishment 9:7 adultery 22:18,24 afternoon 30:2 age 7:2 agency 41:13 ago 35:9 agree 13:24 15:6,10 agreement 14:2 ahead 29:21 al 5:5 ALEX 2:12  allow 15:7,17 alluded	26:7,14 alongside 7:14 ANDERSON 3:4 and/or 39:3 angry 24:5 Annotated 39:3 answer 15:11,21 16:5,23 20:10 30:25 answered 28:19 answers 15:16,18,25 42:7 anybody 27:11 anywise 42:14 Apart 7:9 APPEARANCES 2:1 3:1 appropriate 17:4 29:24 appropriateness 21:16 approximately 5:9 April 1:19 5:8 7:18 41:18 42:18 Arant 1:17 3:9,14 5:11,11 arises 13:16 arrive 17:14 arrived 17:21 Article 41:3 asked	28:8 35:18,22,24 asking 10:20 13:2 29:8 35:17 asset 8:15 assist 39:6 associated 8:21 9:10,17,20 Atlanta 1:18 attach 39:7 Attaching 31:9 attempt 23:6 attorneys 27:12 attorney-client 30:18 August 37:9,13 Avenue 2:13,18 3:14,19 avoid 14:7 aware 13:15 17:9,11 30:7 a.m 1:20 5:9 37:24 38:2 38:18,19 <th data-bbox="867 1375 1166 1417">B</th> b 1:16 41:11,22 42:23 back 14:24 18:19 28:16 34:17 38:1 Background 6:17 bags 20:17 balance 8:15	B	balcony 20:12 Baptist 1:6,8 3:2 5:4 24:12 26:7 Baptists 25:23 basis 15:18,22 29:4,6,9,13 29:16 beach 15:1,3 17:6,14 18:13 18:16,18,19,23 19:6 19:20 20:17 21:13 27:2 35:18 beginning 10:8 22:6 begins 5:2 behalf 1:12 2:1,10 3:2 behavior 26:3 believe 8:6 12:13 27:16 32:11 36:8 BESEN 3:13 best 39:9 beyond 6:21 bikini 18:14,22 bing 33:6 bit 32:25 black 14:8 Blair 3:18 Blankenship 37:4,12 Board 41:3

bookkeeper 8:7 9:24	25:22 41:13,13,15 42:12,15	clarify 36:22	23:1
bookkeeping 11:20	cause 11:1 17:18	clear 13:1 17:1	concerned 22:17,20 29:4
born 6:19	caused 33:10	clergy 13:9 24:21 25:3	concluded 38:19
borrow 20:3	CCR 41:22 42:23	client 29:11,23 38:7	condo 15:2 20:25 24:16
Boult 1:17 3:9,14 5:11,12	cell 33:4	close 14:2	condolences 27:19
Bradley 1:17 3:9,14 5:10,11	CEO 11:22	Code 39:3	condominium 25:3
break 32:19 37:21	certain 8:21 30:4	Coleman 3:23 5:12	conduct 29:23
breaker 23:24	Certified 1:16 41:5	come 16:2 19:18 20:13,15	conference 6:9
Broadway 3:10	certify 39:8 42:4,11	coming 20:14	Conferences 12:18
building 20:13	chairs 18:18,19,20	commencing 1:19	confronted 19:13 23:5
business 35:3,23	Change 39:11	comments 26:20 27:1	Congratulations 7:7
businesses 8:21 9:9	changes 39:3	commission 40:24	connection 8:21,25
B-1601 41:22 42:23	character 30:10	commit 22:24	consider 25:2
<hr/> C <hr/>	charge 41:15	committed 28:11	contact 20:18
C 3:18 42:1,1	Charleston 3:6	COMMITTEE 1:7 3:2	contacted 21:17,21 41:8
call 20:19 26:1,2 36:23	child 6:25	committing 22:18,21	contained 1:13
Callas 3:3 4:2 32:17,22,23 36:16,20 37:20 38:5 38:13,15	chose 34:22	communication 16:10 34:19	continued 3:1
called 5:20 9:20 35:17,17 37:1	church 7:23 24:12 26:7 34:9 35:1	communications 13:3,9,12 16:6 28:2 28:10	contract 41:10,12
caption 42:5	circumstances 21:9	community 25:16,17,22	control 32:1
Carolina 6:19	City 15:1 17:6,14 27:2 34:11	company 29:1	Convention 1:6,8 3:2 5:4
carried 22:6	Civil 1:15 39:3	complete 6:23 42:10	conversation 19:2,3 35:25 36:7
case	claims 29:16,19	completely 28:8	conversations 36:6
		concern	copies 31:9
			copy

38:10,14			
correct	D	desire	draw
30:7 34:11 37:4,7	2:2	39:4	10:3 11:24
42:9	dad	difficult	duly
corrections	7:16	28:25	42:6
39:6,10	Dallas	ding	
correctly	3:15	19:24 20:23	E
30:25	date	dinner	E
Council	5:8	34:8,23 35:4,7	2:4,6,15,20 3:7,12,16
41:4	daughter	direction	3:20 39:1,1 42:1,1
counsel	11:8,9 18:1,3 19:8	42:8	earlier
2:1 3:1 5:15 9:8	27:4	director	6:2 13:15 34:11
15:20 16:25 28:20	daughters	7:22	early
28:23 29:8 31:23	7:5 11:10 18:2	DISCLOSURE	7:2,3 10:17,17 37:8
41:13 42:12,13	day	41:1	37:12
counting	1:19 11:9 12:22	disclosures	easier
31:15	18:23 19:2 40:23	41:4	30:22
course	41:18 42:18	discount	East
24:6 32:8	Deanna	41:16	3:5
court	18:3,4	discuss	education
1:1,16 5:6,13,17	debits	34:8	6:21 7:9,10,15
15:21 28:18 38:7,10	8:12	discussed	either
38:13 41:3,5,8	deceptive	27:6,25	17:16 36:9,24 37:11
courtroom	31:1	discussion	38:5
6:12,13	defend	24:12	elevator
cover	23:6	display	20:15,16
41:14	Defendant	23:14	elicits
covered	2:10 3:2	disqualified	16:10
28:8	Defendants	41:6	ELIZABETH
credits	1:8,12	District	2:3
8:12	define	1:1,1 5:5,6	elizabeth.merritt@...
crossed	25:13	Division	2:8
23:20	defined	1:2 5:7	email
CROSS-EXAMIN...	13:12	divulge	20:19 27:11,25 36:25
5:22 32:21	depends	13:2	emails
Cumming	25:5	Doe	30:4,11,12,19 31:3,4
5:11,12	deposition	13:18,19,22,25 14:10	31:16 32:2
Cummings	1:11,14 5:3,10 6:4,4	14:23 17:9,21 19:3	emotion
1:17 3:9,14	8:24 14:9 16:3	23:5 28:3,12 33:21	23:14
currently	31:24 39:4,4,8,9	34:4,10 35:15 36:7	emphasize
37:24 38:2,17	41:9,10,14	37:6,11,16	29:22
customary	described	Doe's	employ
41:15	8:5,20 31:3	14:12 27:3 36:24	42:13
C.A	descriptive	door	employees
1:5	31:17	20:8,10 22:11 35:21	10:13,17
		double-sided	encounter
		8:12	13:16 14:17 28:3,12

ended 10:10	29:10	8:1 41:16	18:17,22
entail 7:24	explaining 29:15	fine 32:10,20	fully 6:12
entered 39:4	extent 13:11 15:11,13 32:6	firm 5:25 7:14 9:11 14:8	furnish 39:7
entire 19:2	32:12	31:5	further 32:15 38:3 42:11
entirely 13:12 16:1	eyes 34:4,6	firmly 24:4	<hr/> G <hr/>
entirety 19:4	<hr/> F <hr/>	first 14:22 17:17 24:12	G 39:1
entitled 13:5	face 23:19	26:7 34:3 36:23	GA 41:22 42:23
entity 9:20	facilitate 16:20	42:6	gbesen@bradley.c... 3:16
errata 39:7	facing 18:15	five-minute 37:21	gcallas@jacksonke... 3:7
ESQ 2:2,3,3,11,11,12,17	fact 21:16 27:6 29:9	flipping 18:24	gel 22:5
3:3,4,9,13,18	35:22	Floor 2:13	GENE 3:13
estate 9:13,14	fair 29:1	Florida 17:6	Georgia 1:18 39:3 41:4,5
et 5:5	familiar 8:11	follow 8:23	gesturing 18:15,18
events 7:25	family 10:25 11:1,7 34:13	following 39:10 41:4	getting 12:1 14:2
Eventually 8:3	far 19:10 27:19 30:21	follows 5:21	girl 34:24
evidence 42:10	fast 17:3	foregoing 39:8 42:4,8	give 20:4
exactly 7:11 23:25	father 7:12	form 28:14 29:12,14 39:3	given 8:3 15:21 39:5 41:16
Examination 4:1,2,2	Federal 1:15 39:2	formal 7:15	42:10
exceptions 39:9	felt 21:24 22:9 35:23	forth 8:16	giving 29:1
exclusive 41:12	fight 15:9	forward 15:17	go 6:18 9:6 14:15 15:17
EXECUTIVE 1:7 3:2	figured 20:10	forwarded 31:16	18:16 20:6 21:17
EXHIBITS 4:5	file 30:5,12	forwarding 30:4	29:20 34:22 35:2,22
expires 40:24	filed 30:11 32:2	four 7:5	God 16:8
explain	financial	free 10:5	goes 19:21
		front	going 9:6 13:13 14:10 15:7

22:15 37:23 38:16 Gold 2:12 5:25 good 16:7 20:7 22:13 27:10 35:20 grandchild 7:6,6 grandchildren 7:5 great 7:5,6 Gretchen 3:3 32:23 36:14 Guidepost 1:7 2:10 5:4 6:1 26:16 27:13,18	Hoggard 6:20 home 23:22,24 homemaker 7:20 Honor 6:24 hope 14:11 Hopefully 15:15 hour 1:20 hundred 14:10 Hunt 1:3,11 3:23 5:3,4,19 5:24 6:5,16 8:25 13:4,17 16:11 18:6 19:13,17 22:18,20 24:7,8,15 27:3 28:10 30:2,3 31:4 31:16,25 32:3,12,23 39:8 40:21 Hunt's 7:21 9:17 26:5,13 husband 7:12 8:6 14:12 16:2 18:1 19:21 20:18 21:17,20,21,23 22:1 22:1,2,10 27:12 33:22 34:5,10 35:15 36:7,24 37:6,11 husband's 8:22 33:1,18	inappropriately 27:7 incident 23:3 including 8:6 income 12:2,5 INDEX 4:1,5 Indiana 2:5 Indianapolis 2:5 indicate 23:19 indiscernible 22:12 infidelity 22:21 23:2 28:11 information 10:19 instances 24:8,13 instruct 16:5,23 intercept 19:17 interest 41:7 interested 42:14 interject 13:6 intimate 25:9 invade 13:8 invading 22:16 30:18 invite 15:9 involved 11:8 involvement 26:6,14	involving 28:10 iPhone 33:5 issues 23:2
<hr/> H <hr/>			<hr/> J <hr/>
hac 3:3,13 hair 18:24 happened 21:9 27:20 happens 25:5,18 head 13:14 17:8 heard 19:12 24:8 28:9 33:6 hearing 42:11 Hello 5:24 help 21:22,23 22:1,2 henceforth 13:23 hi 32:23 high 6:20,21,22,23 7:1,9 8:10,11 hired 11:22			J 2:3 Jackson 3:4 Jacobson 2:18 Jane 13:19,22,25 14:10,12 14:23 17:9,20 19:3 23:5 27:3 28:3,12 33:21 34:4,10 35:15 36:7,24 37:6,11,15 Janet 1:11 5:3,19 20:4 39:8 40:21 jlanderson@jacks... 3:7 job 22:10 John 6:20 13:18 Johnny 1:3 3:23 5:3 6:5 8:25 9:17 21:2,21 34:15 35:22 JON 3:4 Josh 3:23 5:12 judge's 31:13 Judicial 41:4 July 14:19 17:7,12 33:22 34:3,11 35:5,13,14 36:15 June
	<hr/> I <hr/>		
	idea 16:7 20:7 35:21 important 19:25 improper 25:10,11 inappropriate 21:15 35:20		

17:16,17 junior 6:22	9:11,12,14 30:20 lawsuit 13:16 30:15 31:18 lawyer 30:20 lawyers 16:9 31:20 laying 18:14,17,21 19:1 learn 14:23 18:12 learned 7:17 18:11 leave 19:22 21:10 27:8 35:18,24 leaves 19:22 ledger 8:12 Lee 3:5 left 19:23 legal 5:13,14 6:10 41:8 life 7:2 line 23:20 39:11 litigation 41:16 little 8:3 18:14,21 30:22 32:25 LLC 1:7 2:10 LLP 1:17 2:12 3:9,14 log 32:9 long 35:9 look 33:10 looked	19:25 loss 8:15 lot 7:17 30:20,20 lotion 18:25 love 7:2 lunch 34:16,16 35:2,6	matt@tpmblaw.com 3:20 ma'am 20:20 23:9,10 25:21 33:24 McCormick 2:11 4:2 5:23,25 14:6 15:13,19 16:8,13,16 16:18,21,24 17:5 28:16,21 29:3,6,12 29:18 30:1 31:23 32:15 38:3 mccormick@mint... 2:15 McGill 13:6 17:3 McGill's 31:5 mean 26:10 meeting 37:3,12 members 10:25 11:7 mentioned 33:6,21 35:4 MERRITT 2:3 message 19:14,19 20:5,22 27:17,25 28:2 34:2 34:3 35:14 36:25 messages 20:2,2 21:20 27:19 37:15 messaging 36:10 met 7:2 37:9 Middle 1:1 5:6 mind 24:15,17 minister 25:24 Ministries
<hr/> K <hr/> KATHERINE 2:17 Kelly 3:4 kin 42:11 kind 7:10 9:12 33:2,4,12 kklein@rjfirm.com 2:20 Klein 2:11,17 14:5 32:5 klein@mintzandgo... 2:15 knew 18:18 21:8,10,21 23:19 knocked 20:9 know 6:3 8:14,15 10:1 11:14 13:9 14:12 15:19 17:18 21:8 25:17,24 27:20 28:8 29:9,10,13 30:17 31:23 32:1,4 33:14 knowledge 13:11 16:2 24:11 30:14 39:9 known 25:22 Kramer 1:16 5:14 41:22 42:23		<hr/> M <hr/> M 1:3 3:3 5:3 MacGill 2:2,4 13:24 15:6,16 15:24 16:12,15,17 16:19,22 28:14,19 28:23 29:5,8,15,20 32:14,20 36:13,17 37:22 38:6,9,11,12 magistrate 31:11 Magna 5:13,14 41:8 making 11:10 16:25 28:24,24 28:25 29:17 39:5,6 man 24:16 Marchetti 3:18 marked 4:6 Market 2:4 marriage 28:11 married 6:22,25,25 7:3,20 24:15 matter 5:3 27:12 31:18 MATTHEW 3:18	
<hr/> L <hr/> L 2:3 3:4 lack 21:15,15 law			

6:5 8:25 9:18 12:15	25:17 28:20 32:9	41:7,11	pages
ministry	needed	offended	39:7 42:9
7:21,22 8:22	33:19	21:13,14,18,24	paid
Mintz	never	Offensive	11:12
2:12 5:25	21:21 22:5 23:1	25:15	Panama
minute	27:24	offered	15:1 17:6,14 27:2
10:16	New	16:19	34:11
minutes	2:14,14 11:9 12:15	officer	paralegal
34:18	12:22	9:25 10:1	14:8
Monday	nightmare	offices	parallel
17:12 18:11 19:20	7:18	41:8	18:22
month	Nods	Oh	parties
7:25	13:14 17:8	9:12 35:9,10	41:15 42:12,14
morning	NOKES	Okay	party
6:2 15:10 19:21	3:9	6:15 9:5 10:13 11:15	41:12,16
Morton	nonwaiver	11:17,21 12:14 13:1	password
26:17,24	15:18	13:10,14,21,21 14:4	33:12,14
mother	North	15:15 16:12,16 17:4	PATRICK
7:4	6:19	17:25 18:8,11 19:12	2:3
motion	Notary	19:20 21:7 25:7	patrick.sanders@...
29:7	40:23	26:19 27:1 28:1	2:7
motions	noted	31:22 32:20 35:13	PC
30:21	5:15	36:17 38:16	2:4
mouth	notification	once	Peachtree
31:1	33:7	7:25 18:24 34:23	1:18
move	N.E	35:8	people
28:15,20 29:15	1:18	ongoing	20:12 26:21 27:2,18
moving	<hr/> O <hr/>	25:1	pepper
18:23	oath	open	20:3
<hr/> N <hr/>	6:11	15:21	perfectly
name	object	order	32:10
14:9 18:19	16:12 17:4 28:14	31:13	person
named	objected	organization	13:10,22 14:13 24:21
13:21	15:22	9:3 10:8 11:2	25:3
Nashville	objection	OTCHY	personally
1:2 2:19 3:11,19 5:7	16:14 29:13,14	2:12	13:7 33:25
National	obligation	otchy@mintzandg...	phone
6:24	6:10	2:16	19:22,23,23,24 20:19
nature	occasion	<hr/> P <hr/>	33:1,2,4,7,12,18
25:9	26:21,23	P	35:16,25 36:9,25
necessarily	occurred	39:1	PIETSCH
15:20	33:7 36:2	pack	3:18
necessary	ocean	20:17	Pique
39:7	18:15	Page	3:18
need	OCGA	39:11	place
			13:3 14:18,25 15:2

30:25	35:19	21:12	21:19
places	prior	protect	reaching
25:18	33:22	22:10 32:11	21:22,25 22:2
Plaintiff	privacy	protection	read
1:4 2:1	13:18	33:13	23:18 27:20 28:16
Planning	private	proud	38:8,9 39:8 42:16
7:25	25:18	6:24 7:4	reading
PLC	privilege	provide	1:13
2:18	15:8,12,22 30:18	41:8,12	real
please	32:9	provisions	6:13 9:13,14
5:17 6:16 38:15 39:6	privileged	41:7	really
39:7	32:8	public	9:12 29:3
PLLC	pro	7:13 40:23	reason
3:4,18	3:3,13	Publishers	14:7 21:18 39:11
point	probably	9:21 11:5 12:11	reasons
12:6 21:3	10:6 11:1,10 19:11	pull	39:5
points	33:14 35:12 36:4	17:2	rec
8:5	problem	pulpit	5:16
pool	37:22	26:9,15	recall
34:18	problems	purposes	6:6 12:25 19:14 33:1
poor	34:8	13:17	34:15 36:19 37:10
14:8	Procedure	pursuant	receive
popping	1:15 39:3	1:12 39:2 41:3	12:2,5
20:22	proceed	pursue	recess
positive	16:3 29:25	6:21	37:25
36:5	proceeding	put	record
possibility	29:24	18:25 22:15	5:1,16 17:1 29:22
26:5,13	Proceedings		32:11 37:24,25 38:2
possible	38:19	Q	38:17
15:20	process	question	reduced
Poston	20:1	15:10 16:10 25:19,20	42:7
3:19	produced	25:21 26:12 28:15	referral
practice	32:13	28:17 33:3,16	41:13
30:3	producible	questions	referring
pray	32:7	10:23 13:13 15:25	13:18,22,25 14:11
27:22	production	28:25 29:9 32:16,18	36:14
prejudicial	32:6	38:4,6 42:7	refers
29:11,23,24	professional		13:25
premises	7:10	R	regard
29:17	profit	2:17 3:13 39:1,1 42:1	31:2
presence	8:15	raise	regarding
21:13,14 22:10 27:3	prohibited	24:2,3	6:3
37:11	41:10	rates	Regency-Brentano
present	Promenade	41:15	41:6,8,10,12,15
3:22 17:10 37:4,7	1:17	reach	regular
presented	prompted		42:13

spend 17:18 34:13 spousal 15:8 stated 42:5 statement 39:5 statements 8:16 States 1:1 5:5 stayed 35:2 staying 20:9 stenographic 5:15 sti 8:3 stipend 8:4 stipulations 1:13 stomach 19:1 stood 20:11,14 stray 13:5 Street 1:18 2:4 3:5 strike 28:15 29:7,16 study 8:9 stuff 30:20 35:1 subject 31:17 subscribed 40:22 substance 13:8 39:3 Suite 2:5 3:5,10,15	summer 17:18 summertime 18:9 Sunday 14:20 17:6 21:9 supplemental 39:6 supposed 20:9 sure 6:6 7:17 28:7 36:3 surprised 23:16 swear 5:17 sworn 5:20 40:22 42:6 system 8:12 <hr/> T <hr/> T 2:6,14,19 3:6,11,16 3:20 6:20 39:1 42:1 42:1 take 13:6 14:25 26:4 32:19 37:20 taken 1:12 5:10 42:5 talk 34:24,25 talked 32:25 35:16 talking 25:23 31:2,3 36:9 talks 34:25 tapes 11:11 Taylor 3:18 tell 6:16 7:19 27:5 30:17 30:24 34:7	Tennessee 1:1 2:19 3:11,19 5:6 Terence 2:11 5:25 terms 8:14 testified 5:21 9:7 31:25,25 testify 6:11 15:7 testimony 6:9,10 15:21 19:12 30:3 39:4 Texas 3:15 text 19:14,18 20:1,5,19 20:22 21:20 27:17 27:19,25 28:2 34:2 34:3 35:14 36:10,25 37:15 texted 33:21 34:7 texts 33:25 thank 7:8 14:5 16:25 27:22 32:16 38:6 therapist 13:10 Theresa 1:16 5:14 41:22 42:23 thereto 42:7 thing 22:13 things 22:7 27:21,24 30:23 think 10:4 12:5 14:2 16:7,8 34:16 35:6 36:3,18 37:1,9 thinking 11:9 Third	2:13 thought 23:19 34:24 35:7 time 5:9 9:11 11:4,20 17:10 22:17 32:16 34:13 37:1,24 38:2 38:17 times 14:10 37:10 Timothy+Barnabas 11:15,25 12:4 today 15:16,18 Today's 5:8 told 23:25 27:7,8 35:18 top 18:25 Tower 1:17 transcript 14:9 38:11,14 42:5 42:10,17 translating 30:24 Travel 12:20 true 39:9 42:9 trust 13:5 17:3 truthfully 6:11 try 14:10 trying 15:24 17:2 19:17 30:25 Tuesday 19:21 two 7:5 18:2 20:1 34:12 types 30:19
---	--	--	---

typewriting 42:8	37:24 38:2,17 videographer 3:23 5:1,12 37:23 38:1,16 videotape 5:2 Videotaped 1:11 Virginia 3:6 voice 24:2,4 vs 1:5	wasn't 9:17,19 12:1 24:16 25:4,25 35:11,12,20 water 18:25 way 6:8 7:6 16:19 18:15 18:17 22:6,11 34:21 35:9,19 week 22:14,16 weeks 34:12 went 6:2,20,23 18:13 20:8 34:15,23 35:7 West 2:18 3:6 we'll 13:24 15:14,17 16:6 16:12,23 we're 14:1 15:7,11 31:3 37:21 We've 16:19 32:25 white 18:14,21 wife 7:4 24:17 25:4,25 Wilmington 6:19 wish 13:2 withdrawn 14:24 witness 5:18,20 14:4 42:6,16 [REDACTED] [REDACTED] woman 6:25 13:17 21:25 24:16 25:3,25 26:6 26:14 women	7:25 24:9 women's 7:22 Woodstock 24:12 26:7 word 23:22 words 23:8 31:1 work 9:16 worked 7:13 9:11 11:10,17 worse 29:1 wouldn't 26:1 wrapped 31:24 wrecker 23:22 wrong 24:17
<hr/> U <hr/>	<hr/> W <hr/>	<hr/> X <hr/>	
Uh-huh 8:1 10:9 11:12,24 18:5 22:4,25 27:23 33:17 unaware 29:18 Unbecoming 26:3 undersigned 39:8 understand 6:15 14:1,3,11 20:19 23:10 Understood 32:14 undone 19:1 United 1:1 5:5 Unofficially 11:18,19 update 32:9 updating 31:7 use 23:22 39:6 usual 41:15 usually 19:22	wait 10:16 waited 20:15 waive 38:8 waived 15:14,23 waiver 15:8,17 waiving 15:11 16:4 walk 20:11,12 21:4,5,17 35:23 want 13:1,4,8 15:9,9 16:1 16:5 29:13,22 32:11 34:20 35:1 38:7,10 38:14 wanted 22:9 30:9 wanting 21:17,23 34:7 warned 28:23 warning 29:2	wasn't 9:17,19 12:1 24:16 25:4,25 35:11,12,20 water 18:25 way 6:8 7:6 16:19 18:15 18:17 22:6,11 34:21 35:9,19 week 22:14,16 weeks 34:12 went 6:2,20,23 18:13 20:8 34:15,23 35:7 West 2:18 3:6 we'll 13:24 15:14,17 16:6 16:12,23 we're 14:1 15:7,11 31:3 37:21 We've 16:19 32:25 white 18:14,21 wife 7:4 24:17 25:4,25 Wilmington 6:19 wish 13:2 withdrawn 14:24 witness 5:18,20 14:4 42:6,16 [REDACTED] [REDACTED] woman 6:25 13:17 21:25 24:16 25:3,25 26:6 26:14 women	women's 7:22 Woodstock 24:12 26:7 word 23:22 words 23:8 31:1 work 9:16 worked 7:13 9:11 11:10,17 worse 29:1 wouldn't 26:1 wrapped 31:24 wrecker 23:22 wrong 24:17
<hr/> V <hr/>		<hr/> Y <hr/>	
various 8:5 versa 19:18 versus 5:4 vice 3:3,13 19:18 video			yeah 7:19 11:3 12:11 25:12 36:17,21 year 35:12 years 7:13,23 yesterday 19:12 30:2 yesterday's 31:24 York 2:14,14
		<hr/> Z <hr/>	
			Zoom 2:3,12,17 3:4,18

1	33:1,22 35:14	32	41:7
1	202	4:2	9-11-30(e)
5:2 42:9	40:23	320-3225	39:3
10	2024	3:20	
12:7	1:19 5:8 41:18 42:18	320-3700	
10.B	212	2:19	
41:3	2:14	340-1000	
10016	214	3:6	
2:14	3:16	3600	
1099	2400	3:15	
12:9,12	3:10	37203	
11:02	244-3556	2:19 3:11,19	
1:20 5:9	3:11	38	
11:33	25	42:9	
37:24	17:7		
11:45	25th	4	
38:2,17,19	2:13 14:19 42:18	46204	
1200	25322	2:5	
2:5	3:6	5	
1221	257-9800	5	
3:10	3:16	4:2	
1230	26th	50	
1:18	17:12 18:12	7:13	
1445	27th	500	
3:14	33:22 34:3 35:13,14	3:5	
15th	36:2,5,15		
7:18	28th	6	
15-14-37	36:4	600	
41:11	2908	2:13	
156	3:19	615	
2:4		2:19 3:11,20	
1600	3	696-4848	
3:5	3H	2:14	
17	9:21 11:5 12:11,20		
7:23	3:23-cv-00243	7	
19th	1:6	721-1253	
1:19 5:8 41:18	30(b)(6)	2:6	
1906	6:5	75202	
2:18	30(e)	3:15	
1970	39:2		
6:22	30309	8	
	1:19	8th	
2	304	35:5	
2010	3:6		
14:19 17:7 18:12	317	9	
	2:6	9-11-28(c)	